

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

FILED

2008 APR 29 P 2:00

U.S. DISTRICT COURT
NEW HAVEN, CT

UNITED STATES OF AMERICA,
Plaintiff,

Criminal No.: 3:07-cr-134 (JBA)

v.

IONIA MANAGEMENT, S.A.,
Defendant.

**STIPULATION AND ORDER BETWEEN IONIA MANAGEMENT, S.A. AND THE
UNITED STATES OF AMERICA REGARDING THE PAYMENT OF THE FINE AND
PENALTY AND THE RESTORATION OF THE PAYMENT SCHEDULE**

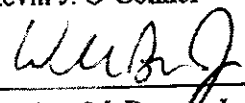
Ionía Management, S.A., (hereinafter "Ionía"), and the United States of America, (hereinafter "United States"), through their undersigned counsels, and subject to the consent of the Court, hereby agree and stipulate as follows:

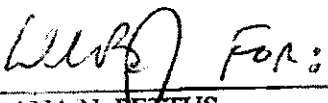
1. Ionía having paid \$1,261,195.45 on March 13, 2008, to satisfy the first installment payment of the fine, the payment schedule set forth in the Court's Ruling and Order dated March 3, 2008 (Docket Entry # 265) is reinstated;
2. Ionía having paid an additional \$500,000.00 on April 21, 2008, this amount is hereby applied to the second fine installment payment, leaving a principal balance of \$725,000, together with interest, due and owing on December 14, 2008; and,
3. The penalty of \$490,000.00 assessed by the Court in its Ruling and Order dated March 7, 2008 (Docket Entry #272), is hereby remitted. In the event any future installment payment becomes delinquent and/or in default a penalty shall be imposed pursuant to 18 U.S.C. section 3612(g).

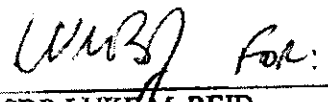
4. Ionia Management S.A will move the Court of Appeals to dismiss with prejudice its appeal from imposition of the penalty (Second Circuit Docket No. 08-1387-cr) in the manner required by F.R.A.P. 42(b). The government will agree to entry of an order dismissing that appeal and the parties agree that no costs are due either party.

Respectfully submitted,

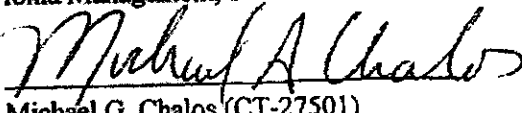
For the Government
**UNITED STATES ATTORNEY
DISTRICT OF CONNECTICUT**
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For the Defendant
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Attorney for Defendant
Ionia Management, S.A.


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing "Stipulation and Proposed Ordered" has been filed and served via Email and via the District of Connecticut's electronic filing system and rules this 16th day of April, 2008, to the following counsel of record:

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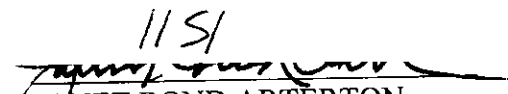
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/s/ Michael G. Chalos

Michael G. Chalos, AVSA

The parties *Stipulation and Order Between Ionia Management, S.A. and the United States of America Regarding the Payment of the Fine and Penalty and the Restoration of the Payment Schedule*, Docket No. 284, dated April 28, 2008, is hereby approved.

So Ordered this 29th day of April, 2008, at New Haven, Connecticut.

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JANET BOND ARTERTON
UNITED STATES DISTRICT JUDGE